

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

G. MARIE NEWBY, Individually, and)
As Administratrix of THE ESTATE OF)
TERRY CHILDRESS,)

Plaintiffs,)

v.)

CORECIVIC OF TENNESSEE, LLC,)
as owner and operator of TROUSDALE)
TURNER CORRECTIONAL CENTER,)
DAMON HININGER, STEVE CONRY,)
RAYMOND BYRD, and SHAWNA)
CURTIS,)

Defendants.)

Civil Action Number 3:22-CV-93
Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Jeffery S. Frensley
Jury Demand

NOTICE OF FILING

Defendant CoreCivic of Tennessee, LLC hereby gives notice of filing the following in support of its Reply in Support of Motion to Quash Subpoenas *Duces Tecum* (Docket Entry 50):

- **Exhibit A:** Copy of the subpoena *duces tecum* that recently was served on Tricia Herzfeld in a different lawsuit that involves prisoner litigation with an identical description of the documents that Plaintiff G. Marie Newby seeks through the subpoena issued to Ms. Herzfeld in this case.

Respectfully submitted,

Joseph F. Welborn, III
Joseph F. Welborn, III (#15076)
joe.welborn@klgates.com
Erin Palmer Polly (#22221)
erin.polly@klgates.com
Terrence M. McKelvey (#36531)
terrence.mckelvey@klgates.com
K&L Gates LLP
222 Second Avenue South, Suite 1700
Nashville, Tennessee 37201
(615) 780-6700
(615) 780-6799

*Counsel for Defendants CoreCivic of
Tennessee, LLC, Damon Hininger, Steven
Conry, Raymond Byrd, and Shawna Curtis*

CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing has been served upon Filing Users via the electronic filing system and on other counsel via U. S. Mail, first-class postage prepaid, this July 5, 2022, on the following:

Daniel A. Horwitz
Lindsay E. Smith
Horwitz Law, PLLC
4016 Westlawn Drive
Nashville, Tennessee 37209

Brice M. Timmons
Craig A. Edgington
Donati Law, PLLC
1545 Union Avenue
Memphis, Tennessee 38104

Joseph F. Welborn, III